Before the

FEDERAL COMMUNICATIONS COMMISSION ECEIVED

Washington, D.C. 20554

SEP 1 0 2002

PERENAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY In the Matter of Petition of WorldCom, Inc. Pursuant to Section 252(e)(5) of the Communications Act for Expedited Preemption of the Jurisdiction of the Virginia State Corporation CC Docket No. 00-218 Commission Regarding Interconnection Disputes with Verizon Virginia Inc., and for Expedited Arbitration In the Matter of Petition of Cox Virginia Telecom, Inc., Pursuant to Section 252(e)(5) of the Communications Act for CC Docket No. 00-249 Preemption of the Jurisdiction of the Virginia State Corporation Commission Regarding Interconnection Disputes with Verizon Virigina Inc. and for Arbitration In the Matter of Petition of AT&T Communications of Virginia Inc., Pursuant to Section 252(e)(5) of the CC Docket No. 00-251 Communications Act for Preemption of the Jurisdiction of the Virginia Corporation Commission Regarding Interconnection Disputes With Verizon Virginia Inc.

WORLDCOM'S MOTION SEEKING LEAVE TO EXCEED PAGE LIMIT FOR OPPOSITION TO PETITION FOR CLARIFICATION AND RECONSIDERATION

WorldCom, Inc. ("WorldCom") respectfully seeks leave to exceed the 25-page limit applicable to an Opposition to a Petition for Reconsideration pursuant to 47 C.F.R. § 1.106(g). WorldCom's Opposition to Verizon's Petition For Clarification and Reconsideration of July 17, 2002 Memorandum Opinion and Order is filed concurrently herewith. In light of the length and content of Verizon's Petition, WorldCom's request is reasonable and will cause no prejudice to Verizon.

On August 16, 2002 Verizon filed its Petition for Clarification and Reconsideration of some of the issues resolved in the Wireline Competition Bureau's 369-page Memorandum Opinion and Order, which was released on July 17, 2002. Concurrent with its Petition, Verizon filed a motion to exceed the twenty five page limit that would ordinarily apply to petitions for reconsideration. Verizon's Petition was approximately forty pages long, and included a new factual declaration from a Verizon witness, as well as arguments that Verizon had not previously presented to the Bureau. Given the length of Verizon's submission, and the fact that it raised arguments that WorldCom had no previous opportunity to address, Verizon cannot legitimately claim to be burdened or prejudiced if WorldCom's motion is granted.

WHEREFORE, WorldCom respectfully requests that it be permitted to exceed the 25page limit and that its accompanying Opposition to Petition for Clarification and Reconsideration
be accepted for filing and considered on its merits.

¹ In re Petition of WorldCom, Inc. Pursuant to Section 252(e) of the Communications Act for Preemption of the Jurisdiction of the Virginia State Corporation Commission Regarding Interconnection Disputes with Verizon Virginia Inc., and for Expedited Arbitration, CC Docket No. 00-218, In the Matter of Petition of Cox Virginia Telcom, Inc., Pursuant to Section 252(e)(5) of the Communications Act for Preemption of the Jurisdiction of the Virginia State Corporation Commission Regarding Interconnection Disputes with Verizon-Virginia, Inc. and for Arbitration, CC Docket No. 00-249, In the Matter of Petition of AT&T Communications of Virginia Inc., Pursuant to Section 252(e)(5) of the Communications Act for Preemption of the Jurisdiction of the Virginia Corporation Commission Regarding Interconnection Disputes with Verizon Virginia Inc., CC Docket No. 00-251, Memorandum Opinion and Order ¶ 1 (rel. July 17, 2002) ("Order").

² As discussed in the accompanying Opposition, Verizon's belated presentation of those new factual assertions is procedurally improper, and unlawful, and must be rejected.

Respectfully submitted,

Lisa B. Smith Kecia Boney Lewis WorldCom, Inc. 1133 19th Street N.W. Washington, D.C 20036

Kimberly Wild WorldCom, Inc. 1133 19th Street, N.W. Washington, D.C. 20036 Jodie L. Kelley

Robin M. Meriweather Jenner & Block, LLC

601 13th Street, N.W.

Washington, D.C. 20005

Counsel for WorldCom, Inc.

CERTIFICATE OF SERVICE

I hereby certify that true and accurate copies of the foregoing Motion Seeking Leave To Exceed Page Limit For Opposition To Petition For Clarification And Reconsideration were delivered this 10th day of September, 2002, by email and in the manner indicated below to:

Karen Zacharia
David Hall
Verizon-Virginia, Inc.
1320 North Courthouse Road, 8th Floor
Arlington, VA 22201
*By Federal Express

Mark Keffer AT&T Corporation 3033 Chain Bridge Road Oakton, VA 22185 *By First Class Mail

Richard D. Gary
Kelly L. Faglioni
Hunton & Williams
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, VA 23219-4074
*By Federal Express

J.G. Harrington
Dow, Lohnes & Albertson
1200 New Hampshire Ave., N.W.
Suite 800
Washington, D.C. 20036
*By First Class Mail

Catherine Kane Ronis Wilmer, Cutler & Pickering, LLP 2445 M Street, NW Washington, DC 20037-1420 *By Federal Express

Lydia Pulley 600 East Main Street 11th Floor Richmond, VA 23219 *By Federal Express

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